

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF GEORGIA
SAVANNAH DIVISION**

JESSICA HODGES, et al.

Plaintiffs,

v.

CHATHAM COUNTY, GEORGIA,

et al.

Defendants.

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CAFN: 4:22-cv-00067

JOINT STATUS REPORT

COME NOW Plaintiffs Jessica Hodges as natural guardian of minor children, L.C. and D.C., and Estate of Lee Michael Creely, by and through Warren Ratchford, its Administrator (“Plaintiffs”) and Defendants Chatham County, Georgia, Don White, Karlos Manning, Terence Jackson, Yvette Bethel-Quinney, CorrectHealth, LLC, CorrectHealth Chatham, LLC, Carlo Musso, M.D., Karen Forchette, and Jackie Harned (“Defendants”) (collectively, the “parties”) and hereby jointly submit a status report in accordance with this Court’s instruction, *Doc. 120*, showing this Honorable Court the following:

I. Discovery Completed

The parties have conducted most of the depositions needed, including almost all of the named Defendants.¹ In addition, with the exception of the production of the documents ordered to be produced by this Honorable Court, the parties have conducted extensive document production and toured the jail.

¹ One named party—Terence Jackson—was deposed on October 19, 2022. Plaintiffs’ counsel has agreed to dismiss Defendant Jackson contingent upon the scheduling of his trial deposition. In addition, the FRCP 30(b)(6) deposition of non-party COCHS was left open in order that COCHS will produce a competent witness.

II. Discovery to be Completed

The parties anticipate conducting approximately 12 additional depositions: Shawn Wood, Jean Llovet, William Freeman², Todd Freeseemann, Lee Smith, Sheriff Wilcher³, Dr. Donoghue, Dr. Ray, and 30(b)(6) depositions of the Sheriff's Office, Chatham County, COCHS, and CorrectHealth. Plaintiffs anticipate 2-3 expert witnesses, and Defendants anticipate 3-4 expert witnesses.

III. Proposed Schedule

The parties propose the following discovery schedule to govern the remainder of these proceedings:

- Last Day to Conduct Fact Discovery: **October 31, 2024**
- Last Day to Furnish Expert Witness Reports by Plaintiffs: **November 18, 2024**
- Last Day to Furnish Expert Witness Reports by Defendants: **December 18, 2024**
- Close of Expert Discovery: **February 28, 2025**
- Joint Status Report Due: **March 14, 2025**
- Last Day for Filing Civil Motions Including *Daubert* Motions But Excluding Motions *In Limine*: **April 14, 2025**

[Date and signatures of counsel are on the following page.]

² Mr. Freeman has a medical condition which may make him unavailable to testify within the October 31, 2024, fact discovery deadline.

³ Sheriff Wilcher has a medical condition which may make him unavailable to testify within the October 31, 2024, fact discovery deadline.

Respectfully submitted, this 31st day of July, 2024.

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